

December 1, 2016
2016.0008

Mr. Daniel Carlson
Central Valley Regional Water Quality Control Board
1685 E Street
Fresno, CA 93706

**REVIEW OF DRAFT WASTE DISCHARGE REQUIREMENTS
CHESTNUT AVENUE LANDFILL ORDER NO. R5-201X-XXXX
FRESNO COUNTY, CALIFORNIA**

On behalf of Republic Services Inc. (Republic), Geo-Logic Associates (GLA) have reviewed the draft Waste Discharge Requirements (WDRs) and Monitoring and Reporting Program (M&RP) that were issued by the Regional Water Quality Control Board – Central Valley Region (RWQCB) to William and Martha Shubin Trustees and BFI Waste Systems of North America LLC for the Chestnut Avenue Landfill.

A summary of our comments relative to the draft WDRs and M&RP are provided below. Except for groundwater elevation monitoring frequency, the recommended revisions are non-substantive editorial comments for the purposes of clarity or to reduce ambiguity. We recommend reducing the groundwater elevation monitoring frequency from quarterly to semiannually because many years of elevation data show monitoring twice per year provides representative groundwater elevation information and that quarterly monitoring does not provide additional meaningful or actionable data. Where changes are recommended, the changed wording is shown in bold italics.

WASTE DISCHARGE REQUIREMENTS

1) Page 4, Item 26 – Suggest modifying the paragraph as follows:

Based upon data in the First Semi-Annual 2016 Groundwater Monitoring Report, the first encountered groundwater ranges from about 86 feet to **128** feet below the native ground surface. Groundwater elevations range from about 185 feet MSL to **144** feet MSL.

2) Page 4, Item 27 – Suggest modifying the paragraph as follows:

Monitoring data from the First Semi-Annual 2016 Groundwater Monitoring Report indicates that ~~background~~ groundwater quality for first encountered groundwater has electrical conductivity (EC) ranging between 895 and 1450 micromhos/cm, with total dissolved solids (TDS) ranging between **480** to **800** milligrams per liter (mg/L).

3) Page 13, Item 4 – Suggest modifying the wording as follows:

... shall not exceed the **WQPS** established pursuant to MRP No. R5-201X-XXXX.

MONITORING & REPORTING PROGRAM

1) Page 2, Item A.1 – Suggest modifying the first sentence of the third paragraph as follows:

Twice per **year**, the Discharger shall....

2) Page 4, Item A.4.d – Suggest modifying the first paragraph as follows:

The Discharger shall conduct Standard Observations at the landfill in accordance with this section of the MRP. Standard observations shall be conducted **quarterly**. ~~in accordance with the following schedule:~~

<u>Landfill Unit Type</u>	<u>Frequency</u>	<u>Season</u>
Active	Weekly	Wet 1 October to 30 April
Active	Monthly	Dry 1 May to 30 September
Inactive/Closed	Monthly	Wet 1 October to 30 April
Inactive/Closed	Quarterly	Dry 1 May to 30 September

3) Page 6, Item B – Reporting, Reporting Requirements – Since the report is submitted electronically, suggest deleting the last sentence of the first paragraph as follows:

... ~~Data shall also be submitted in a digital format, such as a computer disk.~~

4) Page 7, Item B.1.c – Suggest modifying the first sentence as follows:

The estimated **semiannual** groundwater flow rate and

5) Page 9, Item B.2.f – Since the landfill is closed, suggest deleting this paragraph.

6) Page 11, Item C.1.b – Suggest modifying the first sentence as follows:

Include a map showing the monitoring points and background monitoring points for the ~~surface water monitoring program~~, groundwater monitoring program, and.....

7) Page 11, Item C.1 – Suggest modifying the last sentence as follows:

The Water Quality Protection Standard shall be updated **biennially** for each monitoring well using new and historical monitoring data.

8) Page 14, Table 1 – Suggest modifying the sampling frequency for groundwater elevation from quarterly to ***semiannual***.

CLOSURE

This information has been prepared based on our current understanding of the Chestnut Avenue Landfill and is intended for use in discussions with the RWQCB. If you have any questions regarding this letter, please call me.

Geo-Logic Associates



William B. Lopez
Senior Geologist